

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

PETER S. CHRISTIANSEN, ESQ.
Nevada Bar No. 5254
pete@christiansenlaw.com
KENDELEE L. WORKS, ESQ.
Nevada Bar No. 9611
kworks@christiansenlaw.com
CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 240-7979
Fax: (866) 412-6992
-and-

HOWARD L. JACOBS, Application for Admission Pro Hac Vice Pending
howard.jacobs@athleteslawyer.com
Law Offices of Howard L. Jacobs
2815 Townsgate Road, Suite 200
Westlake Village, California 91361
Tel: (805) 418-9892
Fax: (805) 418-9899
Attorneys for Defendant Brock Lesnar

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARK HUNT, an individual,

Plaintiff,

vs.

ZUFFA, LLC d/b/a ULTIMATE FIGHTING
CHAMPIONSHIP, a Nevada limited liability
Company; BROCK LESNAR, an individual;
and DANA WHITE, an individual; and DOES
1-50, inclusive,

Defendants.

Case No. 2:17-cv-00085-JAD-CWH

**DECLARATION OF PETER S.
CHRISTIANSEN IN SUPPORT OF
BROCK LESNAR'S AMENDED
MOTION TO DISMISS PURSUANT TO
FED. R. CIV. P. 12(b)(6)**

I, PETER S. CHRISTIANSEN, declare as follow:

1. I am an attorney duly licensed and admitted to practice before the courts of the
state of Nevada. I represent Defendant Brock Lesnar in the above-captioned matter.

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2. I make this declaration in support of Defendant Brock Lesnar's Amended Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6). Based on my review of the files and records in this case, I have personal knowledge of the contents of this declaration and could testify thereto.

3. Attached as Exhibit A to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of UFC Anti-Doping Policy (UFC ADP). The UFC ADP, effective July 2015 and administered by the United States Anti-Doping Agency (USADA), is publicly accessible at: <http://ufc.usada.org/wp-content/uploads/UFC-anti-doping-policy-EN.pdf>. As set forth in more detail in the accompanying Request for Judicial Notice, the UFC ADP is integral to the allegations contained in Mr. Hunt's Complaint.

4. Attached as Exhibit B to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of a June 7, 2016 *Yahoo! Sports* article which explains and confirms Mr. Lesnar's waiver from the UFC ADP. It is publicly available at: <http://sports.yahoo.com/blogs/mma-cagewriter/brock-lesnar-granted-waiver-from-four-month-drug-testing-requirement-003253522.html>. As set forth in more detail in the accompanying Request for Judicial Notice, the article is integral to the allegations contained in Mr. Hunt's Complaint.

5. Attached as Exhibit C to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of the Notice of Hearing and Notice of Disciplinary Complaint to Brock Lesnar from the Nevada State Athletic Commission. As set forth in more detail in the accompanying Request for Judicial Notice, Mr. Hunt directly references Mr. Lesnar's adjudication under the NSAC within his Complaint. See Comp. ¶¶ 85-87.

6. Attached as Exhibit D to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of Brock Lesnar's Answer and Affirmative Defenses to the NSAC Complaint. As set forth in more detail in the accompanying Request for Judicial Notice, Mr. Hunt directly references Mr.

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Lensar's adjudication under the NSAC within his Complaint. See Comp. ¶¶ 85-87.

7. Attached as Exhibit E to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of Brock Lesnar's Motion for Continuance dated September 19, 2016. As set forth in more detail in the accompanying Request for Judicial Notice, Mr. Hunt directly references Mr. Lensar's adjudication under the NSAC within his Complaint. See Comp. ¶¶ 85-87.

8. Attached as Exhibit F to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of Brock Lesnar's Motion for Continuance dated October 25, 2016. As set forth in more detail in the accompanying Request for Judicial Notice, Mr. Hunt directly references Mr. Lensar's adjudication under the NSAC within his Complaint. See Comp. ¶¶ 85-87.

9. Attached as Exhibit G to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of the fully executed NSAC Adjudication Agreement and Order. As set forth in more detail in the accompanying Request for Judicial Notice, Mr. Hunt directly references Mr. Lensar's adjudication under the NSAC within his Complaint. See Comp. ¶¶ 85-87.

10. Attached as Exhibit H to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of the press release published by the UFC and USADA on January 4, 2017 following its sanction of Brock Lesnar. The press release is available at: <http://ufc.usada.org/brock-lesnar-receives-doping-sanction/>.

11. Attached as Exhibit I to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of an *MMA Fighting* article dated February 14, 2017 which reported that Brock Lesnar notified the UFC of his retirement from MMA. The article is publicly available at: <http://www.mmafighting.com/2017/2/14/14613038/brock-lesnar-notifies-ufc-of-his-retirement-from-mma>. As set forth in more detail in the accompanying Request for Judicial Notice, the article is integral to the allegations contained in Mr. Hunt's Complaint.

12. Attached as Exhibit J to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of an *MMA Fighting* article dated March 4, 2017 which reported that Plaintiff Hunt fought Alistair Overeem in the opening fight of UFC 209's main card event. The article is public available at: <http://www.mmafighting.com/2017/3/5/14819284/mark-hunt-says-he-suffered-broken-tibia-at-ufc-209>. As set forth in more detail in the accompanying Request for Judicial Notice, the article is integral to the allegations contained in Mr. Hunt's Complaint.

13. Attached as Exhibit K to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of Mark Hunt's fight history as reported by the UFC. It is publicly available at <http://www.ufc.com/fighter/mark-hunt>.

14. Attached as Exhibit L to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] is a true and correct copy of an *MMA Fighting* article dated June 9, 2016 which reported that Mr. Hunt said in reference to Defendant Lesnar, "I think he's juiced to the gills." The article is publicly available at <http://www.mmafighting.com/2016/6/9/11894188/mark-hunt-on-brock-lesnar-i-think-hes-juiced-to-the-gills-ufc-200>. As set forth in more detail in the accompanying Request for Judicial Notice, the article is integral to the allegations contained in Mr. Hunt's Complaint.

15. Attached as Exhibit M to the Supplement to Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24] submitted concurrently herewith, is a true and correct copy of an *MMA Fighting* article dated July 16, 2016 which reported that Brock Lesnar passed multiple other USADA drug tests before UFC 200. The article is publicly available at <http://www.mmafighting.com/2016/7/16/12204914/brock-lesnar-passed-multiple-other-usada-drug-tests-before-ufc-200>.

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Executed this 29th day of March, 2017, in Las Vegas, Nevada.

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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the undersigned hereby certifies that on this day, March 23, 2017, a copy of the foregoing document entitled ***DECLARATION OF PETER S. CHRISTIANSEN IN SUPPORT OF BROCK LESNAR'S AMENDED MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(6)*** was filed and served through the Court's electronic filing system (CM/ECF) upon all registered parties and their counsel.



An employee of Christiansen Law Offices